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July 10, 2015

Via Electronic Filing

Honorable Tonianne J. Bongiovanni, U.S.M.J.
United States District Court of New Jersey
Clarkson S. Fisher Fed. Bldg. & U.S. Courthouse
402 East State Street, Room 6052
Trenton, New Jersey 08608

Re: Astrazeneca AB, et al. v. Actavis Laboratories FL, Inc., et al.
Civil Action No.: 14-cv-07870-MLC-TJB

Dear Judge Bongiovanni:

This firm, together with Merchant & Gould P.C. in Minneapolis, represents the defendants in the above matter. We are submitting this letter jointly on behalf of all parties herein to respectfully request that the Court convert the initial in-person conference herein, currently scheduled for July 20, 2015 at 12:00 p.m. into a telephonic conference.

This case is related to the matter of Astrazeneca AB, et al. v. Watson Laboratories, Inc. – Florida, et al., Civil Action Number 13-cv-01669–MLC-TJB, the proceedings in which are currently stayed by Your Honor’s Order of June 4, 2015. The parties today have submitted to the Court a proposed Joint Discovery Plan, and have no dispute between us with any aspect of that Plan. The offices for patent counsel are out-of-state, and the attorneys for each side would therefore have to travel substantial distances to attend an in-person conference as currently scheduled.

All counsel are available for a telephonic conference on July 20, 2015, if Your Honor so permits.

Respectfully yours,

s/Robert J. Fettweis

Robert J. Fettweis

RJF:sas

cc: John E. Flaherty, Esq. {via e-mail}
Ravin R. Patel, Esq. (via e-mail)

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